

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Oxbow Calcining, LLC	AI #:	29884	TEMPO Activity No:	PER20090002
Facility Name:	Baton Rouge Calcined Coke Plant	Remarks Submitted by:	ENVIRON International Corp.		
Permit Writer:	Rusty J. Jack	Permit Writer Email Address:	rusty.jack@ia.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permit Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air permit briefing sheet, pg. 2	Remove or define asterisk on Non-VOC TAPs.	The asterisk has been removed.
Air permit briefing sheet, pg. 4	<u>VIII. General Condition XVII Activities</u> Revise emissions for "Kiln startup and shutdown" PM ₁₀ – 0.02 tons SO ₂ – 1.25 tons NO _x – 4.70 tons CO – 0.02 tons <i>Documentation for this change will be provided in an addendum under separate submittal.</i>	The change has been made. Received
Air permit briefing sheet, pg. 4	<u>VIII. General Condition XVII Activities</u> Add emissions for "Kiln Feed Scoop Backflow Emissions" PM ₁₀ – <0.01 tons <i>Documentation for this change will be provided in an addendum under separate submittal.</i>	The change has been made.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air permit briefing sheet, pg. 4	<p><u>IX. Insignificant Activities</u> Please include the following new IAs: <u>LAC 33:III.501.B.5.A.3</u> IA-34-41 (8) 110 gallon Lube Oil Tanks IA-42-43 (2) 150 gallon Diesel Storage Tanks IA-44 (1) 140 gallon Diesel Storage Tank <u>LAC 33:III.501.B.5.A.6</u> IA-45 Laboratory Sampling <u>LAC 33:III.501.B.5.D</u> IA-46-48 (3) Kiln Auxiliary Natural Gas Engines</p> <p><i>Documentation for this change will be provided in an addendum under separate submittal.</i></p>	The changes have been made.
XI. Table 2 Explanation for Exemption Status or Non-Applicability of a Source, Page 8	<p><u>EQT 01-04 40 CFR 63 Subpart CCCCC Notes</u> Revise notes from ".....Coke Ovens produces green petroleum coke..." to read ".....Coke Ovens produce green petroleum coke....."</p>	The change has been made.
Inventories, pg. 1 of 2: Subject Item Inventory and Stack Information	<p><u>EQT 0011</u> Change Description from "14 – No. 1 Coke Load-Out" to "14 – No. 1 Coke Load-Out Tank" per EIQ sheet.</p>	The change has been made.
Inventories, pg. 1 of 2: Subject Item Inventory	<p><u>EQT 0014</u> Insert "Unleaded Gasoline" under the contents column.</p>	The change has been made.
Inventories, pg. 1 of 2: Subject Item Inventory	<p><u>FUG 0001, 0002, 0004</u> Insert "Coke" under the contents column.</p>	The change has been made.
Inventories, pg. 1 of 2: Subject Item Inventory	<p><u>FUG 0004</u> Insert Normal Operating Rate of "1,401,600 tons/yr" per EIQ sheet.</p>	The change has been made.
Inventories, pg. 1 of 2: Stack Information	<p><u>EQTs: 0004, 0005, 0006, 0007</u> Insert Diameter of "14" per EIQ sheet.</p>	The change has been made.
Inventories, pg. 1 of 2: Stack Information	<p><u>EQTs: 0005, 0006, 0007</u> Insert Velocity of "34.74" per EIQ sheet.</p>	The change has been made.
Inventories, pg. 1 of 2: Stack Information	<p><u>EQT 0008</u> Insert Diameter of "2.5" per EIQ sheet.</p>	The change has been made.
Inventories, pg. 1 of 2: Stack Information	<p><u>EQTs: 0009, 0011</u> Insert Diameter of "1.5" per EIQ sheet.</p>	The change has been made.

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Inventories, pg. 1 of 2: Stack Information	<u>EQT 0012</u> Insert Diameter of "1.4" per EIQ sheet.	The change has been made.
Inventories, pg. 1 of 2: Stack Information	<u>EQT 0013</u> Insert Diameter of "7" per EIQ sheet.	The change has been made.
Inventories, pg. 2 of 2: Group Membership and Specific Requirements	EQT 0008 "8: Coke Sizing Facility" should be included in CRG 0001. SR 56-60 should be deleted.	The changes have been made.
Emission Rates for Criteria Pollutants, and Emission Rates for TAP/HAP & Other Pollutants	Please revise emissions to match emission rates as submitted on EIQ sheets and found on the attached document to correct historic rounding errors. No changes have been made to these sources however the current rounding does not match current LDEQ rounding conventions.	The changes have been made as determined appropriate.
Emission Rates for TAP/HAP & Other Pollutants	<u>Add EQT 0014</u> Benzene- 0.001 average lb/hr and <0.01 ton/yr Ethylbenzene- <0.001 average lb/hr and <0.01 ton/yr Hexane - 0.001 average lb/hr and <0.01 ton/yr Naphthalene- <0.001 average lb/hr and <0.01 ton/yr Toluene- <0.001 average lb/hr and <0.01 ton/yr Xylene- <0.001 average lb/hr and <0.01 ton/yr <i>Documentation for this change will be provided in an addendum under separate submittal.</i>	The change has been made.
Specific Requirements	<u>SR 24, 35, 42, 55</u> Remove "Method 23" and "Method 8" and Change "Method 6" to "Method 6C" as requested by Administrative Amendment dated September 30, 2009 and supplemented October 5, 2009.	The change has been made.
Specific Requirements	<u>EQT 0004, 0005, 0006, 0007</u> Document exemption to LAC 33:III.1311.C during periods of Startup as allowed by LAC 33:III.1311.G. Specifically, Oxbow proposes the follow specific requirement be included: "During periods of startup, this source is exempt from the opacity requirements of LAC 33:III.1311.C as allowed by LAC 33:III.1311.G as strict conformity with these provisions would cause undue hardship, would be unreasonable, impractical or not feasible under the circumstances." <i>Documentation for this change will be provided in an addendum under separate submittal.</i>	The change will not be made. §1311.G references variances which cannot be granted for longer than one (1) year pursuant to R.S. 30:2056(C).

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements	UNF 0001 Specific Requirement 84 Revise requirement from "Activate the preplanned strategy listed in..." to read "Activate the preplanned abatement strategy listed in..."	The change has been made.